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13 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS OPPOSITION TO  
OTTO TRUCKING'S MOTION TO  
COMPEL A SECOND DEPOSITION  
OF LARRY PAGE (DKT. 1098)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Plaintiff's Administrative Motion to File Under Seal Portions of Its Opposition to Otto  
6 Trucking's Motion to Compel a Second Deposition of Larry Page (Dkt. 1098).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 8	Blue-Highlighted Portions
Exhibit 11	Blue-Highlighted Portions

9  
10  
11  
12  
13 3. The blue-highlighted portions of Exhibit 8 contain highly confidential information  
14 regarding Uber's LiDAR strategy, priorities, and internal commercialization timelines for various  
15 products. This highly confidential information is not publicly known, and its confidentiality is  
16 strictly maintained. I understand that if this information were to be released to the public, it  
17 would disclose Uber's LiDAR development details, timelines, and priorities. Disclosure of this  
18 information would allow Defendants' competitors and counterparties to tailor their own technical  
19 and strategic decisions, such that Uber's competitive standing could be harmed.

20 4. The blue-highlighted portions of Exhibit 11 contain highly confidential  
21 information regarding Uber's internal commercialization estimates and self-driving strategy  
22 goals, as well as highly confidential information regarding the specific financial terms of a  
23 business agreement. This highly confidential information is not publicly known, and its  
24 confidentiality is strictly maintained. I understand that if this information were to be released to  
25 the public, Defendants' competitors and counterparties would have insight into the self-driving  
26 and market strategy information of Defendants, which would allow them to tailor their own  
27 market strategy, such that Uber's competitive standing could be harmed. In addition, disclosure  
28 of financial terms to business agreements would give competitors insight into how Defendants

1 structure their business relationships, which would allow competitors to tailor their own business  
2 negotiation strategy in this highly competitive and fast-moving market.

3 5. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's  
4 Motion and supporting exhibits that merit sealing.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is  
6 true and correct. Executed this 11th day of August, 2017, at San Francisco, CA.

7  
8  
9 /s/ Michelle Yang

Michelle Yang

10  
11 **ATTESTATION OF E-FILED SIGNATURE**

12 I, Arturo J. González, am the ECF User whose ID and password are being used to file this  
13 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has  
14 concurred in this filing.

15 Dated: August 11, 2017

16 /s/ Arturo J. González

Arturo J. González